

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA,

v.

AHMAD KAZZELBACH

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Crim. Case No. JKB-19-0530

CONSENT MOTION TO MODIFY RELEASE CONDITIONS

The defendant, Ahmad Kazzelbach, by and through his undersigned counsel, respectfully moves this Honorable Court to modify his conditions of release to eliminate the curfew requirement. The government and Pretrial Services consent to this request. In support of this motion, Mr. Kazzelbach states as follows:

1. On January 14, 2019, Mr. Kazzelbach was charged by criminal complaint with offenses pertaining to obtaining information from a protected computer, cyberstalking, and aggravated identity theft. Mr. Kazzelbach had an initial appearance on the complaint on January 22, 2019. He was released on conditions the same day.

2. Mr. Kazzelbach was initially released on very restrictive conditions, including location monitoring with 24/7 home confinement. *See* Dkt. No. 9. On May 22, 2019, with the consent of the government and Pretrial Services, the Court modified Mr. Kazzelbach's release conditions to place him on a curfew in lieu of home confinement. The curfew currently restricts him to the residence between 7:00pm and 6:00am. *See* Dkt. Nos. 19, 22. Throughout the nearly 12 months that Mr. Kazzelbach has been on pretrial supervision, he has been fully compliant with all conditions of release.

3. Mr. Kazzelbach currently works during the day. He has the opportunity to work night shifts at a second job and would like to be able to accept this opportunity to support his family. He is unable to do so without a modification of his curfew. In light of Mr. Kazzelbach's track record of compliance with all release conditions, we respectfully submit that the curfew is no longer necessary.

4. Undersigned counsel has conferred with AUSA Jeffrey Izant and with U.S. Pretrial Services Officer Kenneth Langston and both have stated that they consent to the proposed modification, eliminating Mr. Kazzelbach's curfew.

For all of these reasons, we respectfully request that the Court enter an order modifying Mr. Kazzelbach's release conditions to eliminate the curfew requirement. A proposed order is attached.

Respectfully submitted,

JAMES WYDA
Federal Public Defender

_____/s/_____
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